

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

UNITED STATES DISTRICT COURT

AUG 18 2010 *dh*

for the

District of New MexicoUnited States of America

v.

Lucas PAEZ

DOB: 12-29-1981

Defendant**MATTHEW J. DYKMAN**
CLERKCase No. 10MS2255**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

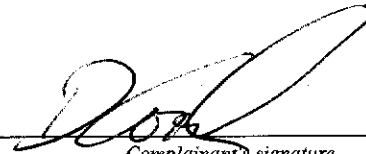
On or about the date of 08-17-2010 in the county of Bernalillo in the _____ District of
New Mexico, the defendant violated 21 U.S.C. § 841(b)(1)(B), 841(b)(1)(C),
 an offense described as follows:

knowingly or intentionally distribute more than 50 grams of a mixture or substance
 containing a detectable amount of methamphetamine.

knowingly or intentionally distribute a mixture or substance containing a detectable
 amount of cocaine.

This criminal complaint is based on these facts:

See attached affidavit.

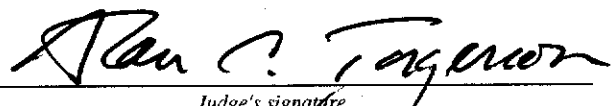
☒ Continued on the attached sheet.

Complainant's signature

Douglas Gooch, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 8-18-10City and state: Albuquerque, NM

Judge's signature

Alan C. Torgerson U.S. Magistrate Judge

Printed name and title

STATE AND DISTRICT OF NEW MEXICO

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SS. AFFIDAVIT

AFFIDAVIT

1. I, Douglas P. Gooch, Special Agent (SA), Drug Enforcement Administration (DEA), United States Department of Justice, being duly sworn, do depose and hereby state the following:

2. I am presently employed by the Drug Enforcement Administration (DEA), United States Department of Justice. During the course of my employment I have received approximately 500 hours of specialized narcotics-related training and have participated and conducted in drug trafficking investigations.

3. On August 14, 2010, at approximately 4:45 p.m., a Confidential Informant (CS) made a recorded phone call to Lucas PAEZ (PAEZ) at 505-507-4547 (TARGET TELEPHONE) to order approximately 6 ounces of cocaine and 6 ounces of methamphetamine. The CS stated that the CS would meet PAEZ in Bernalillo at 1:00 p.m. on Tuesday, August 17, 2010, to complete the drug purchase. On August 14, 2010, at approximately 5:00 p.m., the CS sent PAEZ a text message to the TARGET TELEPHONE to confirm the purchase from PAEZ of the above referenced cocaine and methamphetamine and to confirm the meeting in Bernalillo, NM, at 1:00 p.m., on August 17, 2010. At approximately 5:02 p.m. on the 14th, PAEZ sent the CS a text message and confirmed to the CS that PAEZ would be ready for the drug transaction on the 17th and that it would cost \$8,400.

4. On August 17, 2010, at approximately 12:00 p.m., Agents from the Drug Enforcement Administration (DEA) and the Middle Rio Grande Valley Task Force (MRGVTF) established surveillance at 13152 Neon Ave. NE, Albuquerque NM. This is the residence of PAEZ. At approximately 12:32 p.m., Agents observed a black Toyota Tundra, bearing NM License KTY

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980, registered to Cheryl HOBBS, leave the residence. This vehicle was being driven by PAEZ.

5. Constant surveillance was maintained on the Tundra as Agents observed the Tundra drive directly to Sonic Restaurant at 413 W. Highway 550, Bernalillo, NM, where he was to meet the CS. At approximately 1:10 p.m., Agent Clarence Davis observed the Tundra park on the north side of the restaurant under the awning.

6. At approximately 1:13 p.m., Agents from the MRGVTF, clearly marked in police insignia, arrested PAEZ while he was parked at the Sonic restaurant. During the search of the Tundra, agents located approximately 199.1 Grams of cocaine and 222.3 grams of methamphetamine. The cocaine and methamphetamine were wrapped in a plastic Ziploc bag further concealed inside of a gray car parts box on the passenger seat of the Tundra. The suspected cocaine was field-tested and yielded a positive result for the presence of cocaine. The suspected methamphetamine was also field-tested and yielded a positive result for the presence of methamphetamine.

7. PAEZ was read his Miranda warning which he stated that he understood, and initially agreed to make a statement. PAEZ stated that the cocaine and the methamphetamine were his and that he was going to sell the drugs to the CS in order to pay off another drug debt.

I declare under penalty of perjury that the facts contained herein are true and correct to the best of my information and knowledge.



Douglas P. Gooch, Special Agent
Drug Enforcement Administration

AT

SWORN and SUBSCRIBED to before me
this 18 day of August, 2010

A handwritten signature in cursive script, reading "Alan C. Torgerson". The signature is written in black ink and is positioned above a horizontal line.

Alan C. Torgerson
United States Magistrate Judge